

**Yvon Poulin**

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**Volume:** 1  
**Pages:** 1-18  
**Exhibits:** None

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE



**Case No. 15-CV-00280-PB**

JONATHAN LEITE,

Plaintiff,

v.

MATTHEW GOULET, et al.,

**Defendants.**

## **DEPOSITION OF YVON POULIN**

September 20, 2017

11:12 a.m. to 11:30 a.m.

## NORTHERN NH CORRECTIONAL FACILITY

138 East Milan Road

## Berlin, New Hampshire

**Reporter:** Celeste A. Quimby, LCR No. 17

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<p>1                           <b>I N D E X</b></p> <p>2</p> <p>3   WITNESS:     Yvon Poulin</p> <p>4</p> <p>5   EXAMINATION:</p> <p>6                           By Mr. King</p> <p>7</p> <p>8</p> <p>9</p> <p>10 EXHIBITS FOR IDENTIFICATION:</p> <p>11                          None.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	Page 2	Page 4
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<p>1   A P P E A R A N C E S</p> <p>2   For the Plaintiff:</p> <p>3       DOUGLAS, LEONARD &amp; GARVEY, P.C. 4       By: Benjamin T. King, Esq. 5                           Megan E. Douglass, Esq. 6                           14 South Street, Suite 5 7                           Concord, NH 03301 8                           (603) 224-1988 9                           benjamin@nhalawoffice.com 10                          mdouglass@nhalawoffice.com</p> <p>11   For the Defendants:</p> <p>12       NEW HAMPSHIRE DEPARTMENT OF JUSTICE 13       OFFICE OF THE ATTORNEY GENERAL 14       By: Lynmarie C. Cusack, Esq. 15                           Francis K. Fredericks Jr., Esq. 16                           33 Capitol Street 17                           Concord, NH 03301 18                           (603) 271-3658 19                           lynmarie.cusack@doj.nh.gov 20                           francis.fredericksjr@doj.nh.gov</p> <p>21                          STIPULATIONS</p> <p>22       It is agreed that the deposition shall be 23       taken in the first instance in stenotype and when 24       transcribed may be used for all purposes for which 25       depositions are competent under the Federal Rules 26       of Civil Procedure.</p> <p>27       Notice, filing, caption, and all other 28       formalities are waived. All objections except as 29       to form are reserved until the time of trial.</p> <p>30       It is further agreed that if the deposition 31       is not signed within thirty (30) days after 32       submission to counsel, the signature of the 33       deponent is waived.</p> <p>34</p>	Page 3	Page 5

<p>1 of what was recorded or downloaded?</p> <p>2 <b>A. I think Investigations takes care of</b></p> <p>3 <b>that.</b></p> <p>4 Q. Okay. Would you ever receive</p> <p>5 instructions from personnel in Investigations or</p> <p>6 someone such as a shift commander to preserve</p> <p>7 certain video footage?</p> <p>8 <b>A. No. They usually know how to do it. I</b></p> <p>9 <b>teach them right at the beginning and whoever does</b></p> <p>10 <b>it from there.</b></p> <p>11 Q. Okay. I'm going to represent to you that</p> <p>12 we have an incident report from a shift commander</p> <p>13 on duty on August 24th, 2012, where the shift</p> <p>14 commander writes that he reviewed video evidence</p> <p>15 of Jonathan Leite leaning over his bunk and</p> <p>16 vomiting onto the floor. I will further represent</p> <p>17 to you that that video footage described in the</p> <p>18 incident report has not been produced and is</p> <p>19 apparently lost. How would that happen?</p> <p>20 <b>A. On my end, I have no idea.</b></p> <p>21 <b>MR. FREDERICKS:</b> Objection. Go ahead.</p> <p>22 <b>A. On my end, I have no idea. The video --</b></p> <p>23 <b>the DVR didn't lose it, because nothing would be</b></p>	<p>Page 6</p> <p>1 of August 24th, 2012, what would have happened to</p> <p>2 the video footage?</p> <p>3 <b>A. It gets rewritten over with new video.</b></p> <p>4 Q. So it's lost?</p> <p>5 <b>A. Lost, yup.</b></p> <p>6 Q. Back in August or September of 2012, did</p> <p>7 anyone here at the Northern New Hampshire</p> <p>8 Correctional Facility communicate with you</p> <p>9 regarding preserving video footage of F block</p> <p>10 taken on August 24th, 2012?</p> <p>11 <b>A. I don't recall anything like that</b></p> <p>12 <b>happening.</b></p> <p>13 Q. Back in August and September of 2012, who</p> <p>14 had access to the video footage taken of F block</p> <p>15 on August 24th, 2012, within the 15-day period</p> <p>16 following August 24th, 2012?</p> <p>17 <b>A. I honestly don't know who they bring in</b></p> <p>18 <b>there with them, who gets the key. I'm not sure</b></p> <p>19 <b>how that works.</b></p> <p>20 Q. Okay. Back in August and September of</p> <p>21 2012, did persons employed as shift commanders</p> <p>22 here at the correctional facility know that video</p> <p>23 footage would be lost if it were not downloaded</p>
<p>1 <b>erased. The only thing I can do to a DVR is wipe</b></p> <p>2 <b>out the hard drive.</b></p> <p>3 Q. All right. Would you be able at this</p> <p>4 point in time to recapture and produce all the</p> <p>5 video footage of activities on F block on August</p> <p>6 24th, 2012?</p> <p>7 <b>A. On -- my DVRs can't go back that far.</b></p> <p>8 <b>They got about 15 days or so.</b></p> <p>9 Q. Back in 2012 was that the case, a</p> <p>10 15-day --</p> <p>11 <b>A. Approximate, yeah.</b></p> <p>12 Q. -- life?</p> <p>13 <b>A. And it's always different because it's</b></p> <p>14 <b>all motion controlled, motion sensors. So you</b></p> <p>15 <b>always get a day or two difference.</b></p> <p>16 <b>MR. FREDERICKS:</b> Let him finish the full</p> <p>17 question.</p> <p>18 <b>THE WITNESS:</b> Um-hum.</p> <p>19 <b>MR. FREDERICKS:</b> Just for the record to</p> <p>20 be clear.</p> <p>21 Q. BY MR. KING: Okay. Back in August and</p> <p>22 September of 2012, if video footage of F block</p> <p>23 were not downloaded within approximately 15 days</p>	<p>Page 7</p> <p>1 within 15 days?</p> <p>2 <b>MR. FREDERICKS:</b> Objection to form. Go</p> <p>3 ahead.</p> <p>4 <b>A. Well, some do. Some don't. I'm not sure</b></p> <p>5 <b>a hundred percent who knows and who doesn't know.</b></p> <p>6 Q. Certainly. Do you know who Jeffrey Smith</p> <p>7 is?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. And back on August 24th, 2012, Jeffrey</p> <p>10 Smith was employed as a sergeant here, right?</p> <p>11 <b>A. I'm -- I think, yeah. I don't know if he</b></p> <p>12 <b>was a sergeant, but I know he was...</b></p> <p>13 Q. Do you know whether Sergeant Smith on</p> <p>14 August 24th, 2012, would have known that if he did</p> <p>15 not download video footage of an incident within</p> <p>16 15 days of that incident occurring, that the video</p> <p>17 footage would be lost?</p> <p>18 <b>A. I have no idea if he knew or not.</b></p> <p>19 Q. On August 24th, 2012, or at any time</p> <p>20 preceding that, did you communicate with Northern</p> <p>21 New Hampshire Correctional Facility personnel that</p> <p>22 video footage would be lost if it were not</p> <p>23 downloaded within 15 days?</p>

1 A. No, I didn't tell -- didn't publicize 2 that at all. 3 Q. Why not? 4 A. I just -- people who are at the DVR, I 5 tell them how long it lasts, that's it. 6 Q. Who would you tell how long it lasts? 7 A. Anybody at the time that's at the DVR, if 8 they're wondering, if they ask me, I let them 9 know. 10 Q. So if correctional facility personnel 11 wanted to review video on August 24th, 2012, would 12 they have needed to come to you for assistance? 13 A. Nope, not at all. 14 Q. Why not? 15 A. They know how to run it. They know how 16 to download video. 17 Q. How do they know? 18 A. I taught them in the very beginning, and 19 from there it's fairly straightforward. 20 Q. So you're telling me that you taught 21 personnel how to download video, but you never 22 told them that the video footage would be lost if 23 they didn't download it within 15 days?	Page 10  1 Q. Back on August 24th, 2012, what types of 2 employees associated with the Northern New 3 Hampshire Correctional Facility had the training 4 on how to download video? 5 A. That, I would not know. They do their 6 own thing. Who they show, who they train, I have 7 no idea. I just maintain it. 8 Q. All right. Who administered such 9 training back on August 24th, 2012? 10 <b>MR. FREDERICKS:</b> Objection to form. 11 A. I'm not sure who would have done it. 12 Q. Had you ever trained anyone on how to 13 download video here? 14 A. Just when I installed it, I showed them 15 how to use it, and then they probably showed other 16 people. But that's all I do. 17 Q. When did you install it? 18 A. That was installed in I want to say '08 19 or '09, somewhere around there. 20 Q. All right. Do you remember ever telling 21 Jeffrey Smith on August 24th, 2012, or any time -- 22 strike that. 23 Do you remember telling Sergeant Smith at
Page 11  1 <b>MR. FREDERICKS:</b> Objection to form. You 2 can answer. 3 A. Just people -- people that are in the 4 video room at the time, if they're wondering, you 5 know, I tell them -- I show them how to use it. I 6 said you've got somewhere around 15 days. Who 7 they tell after that, I have no idea. 8 Q. Back on August 24th, 2012, was that 9 reduced to writing in any Northern New Hampshire 10 Correctional Facility document that video footage 11 would be lost if it weren't downloaded within 15 12 days? 13 <b>MR. FREDERICKS:</b> Objection. 14 A. I don't know if they wrote it down 15 anywhere. I have no idea. Nothing that I wrote. 16 Q. As of August 24th, 2012, who besides you 17 associated with the Northern New Hampshire 18 Correctional Facility would have known that video 19 footage would be lost if it were not downloaded 20 within 15 days? 21 <b>MR. FREDERICKS:</b> Objection to form. 22 A. I don't know how many people would know. 23 I'm sure by word of mouth.	Page 11  1 any time before September 10th, 2012, that video 2 footage had to be downloaded within 15 days? 3 A. I don't recall. Don't remember. 4 Q. Have you ever had any communications with 5 an investigator by the name of Timothy Coulombe 6 with regard to preservation of video evidence? 7 A. He would have been one of the ones I 8 would have trained. 9 Q. So would you have told Investigator 10 Coulombe that if the video footage weren't 11 downloaded within 15 days, it would be lost? 12 A. I don't know if I told him directly. 13 It's too long ago for me. 14 Q. When would you have trained him? 15 A. When it was installed back in '08, '09. 16 Q. All right. Have you ever participated 17 in any communications with a Detective Michael 18 Cote with regards to the preservation of video 19 evidence? 20 A. No. 21 Q. You told me a few moments ago that Tim 22 Coulombe would have been one of the persons whom 23 you trained on the video, right?

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<p>1 A. Um-hum. 2 Q. Yes? 3 A. Yeah. 4 MR. FREDERICKS: You have to answer. 5 A. It would be, right. 6 Q. Do you recall whether you trained Jeffrey 7 Smith? 8 A. No, I didn't. 9 Q. Do you know who trained Jeffrey Smith? 10 A. No idea. 11 Q. Has there ever been an instance that you 12 can recall in your capacity as the electronics 13 technician here where some personnel associated 14 with the Northern New Hampshire Correctional 15 Facility has instructed you to preserve video 16 evidence? 17 A. I'm not in charge of that. I never 18 download anything. 19 Q. All right. Would Scott Lambertson have 20 been one of the persons whom you trained on the 21 video? 22 A. I don't recall training him, no. 23 Q. Okay. Have you had any -- did you have</p>		<p>1 CERTIFICATE OF WITNESS 2 3 I, Yvon Poulin, have read the foregoing 4 transcript of deposition taken on Wednesday, 5 September 20, 2017, at the Northern NH 6 Correctional Facility, Berlin, New Hampshire, and 7 do hereby swear/affirm it is an accurate and 8 complete record of my testimony given under oath 9 in the matter of Leite v. Goulet, et al., 10 including any and all corrections that may appear 11 on those pages denoted as "Corrections." 12 13 _____ 14 Yvon Poulin 15 STATE OF _____ 16 COUNTY OF _____ 17 18 Subscribed and sworn to before me this _____ day 19 of _____, 2017. 20 21 _____ 22 Notary Public _____ J.P. _____ 23 My Commission Expires: _____</p>
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<p>1 any communications at any time with Scott 2 Lambertson when he was the chief security officer 3 here with regard to the preservation of video 4 evidence? 5 A. I couldn't recall. I don't remember. 6 MR. KING: Okay. Thank you. I don't 7 have anything further. 8 THE WITNESS: Okay. 9 MR. FREDERICKS: Okay. We're all set. 10 (Deposition concluded at 11:30 a.m.) 11 12 13 14 15 16 17 18 19 20 21 22 23</p>		<p>1 CORRECTION AND SIGNATURE PAGE 2 DEPOSITION: Yvon Poulin 3 DATE OF DEPOSITION: September 20, 2017 4 PAGE LINE NOW READS SHOULD READ 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 Dated this _____ day of _____, 2017. 21 22 _____ 23 Yvon Poulin</p>

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1 C E R T I F I C A T E

2 I, Celeste A. Quimby, a Licensed Court  
3 Reporter of the State of New Hampshire, do hereby  
4 certify that the foregoing is a true and accurate  
5 transcript of my stenographic notes of the  
6 deposition of Yvon Poulin, who was first duly  
7 sworn, taken at the place and on the date  
8 hereinbefore set forth.

9 I further certify that I am neither attorney  
10 nor counsel for, nor related to or employed by any  
11 of the parties to the action in which this  
12 deposition was taken, and further that I am not a  
13 relative or employee of any attorney or counsel  
14 employed in this case, nor am I financially  
15 interested in this action.

16 THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT  
17 DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY  
18 ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR  
19 DIRECTION OF THE CERTIFYING REPORTER.

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23 CELESTE A. QUIMBY, LCR No. 17

<p><b>A</b></p> <p>able (1) 7:3 access (1) 8:14 accurate (1) 16:7 activities (1) 7:5 administered (1) 12:8 ago (2) 13:13,21 ahead (2) 6:21;9:3 al (1) 16:9 always (2) 7:13,15 apparently (1) 6:19 appear (1) 16:10 Approximate (1) 7:11 approximately (1) 7:23 around (2) 11:6;12:19 assistance (1) 10:12 associated (3) 11:17;12:2;14:13 <b>August (23)</b> 4:20;5:5,19,23;6:13;7:5, 21;8:1,6,10,13,15,16,20;9:9, 14,19;10:11;11:8,16;12:1,9, 21</p>	<p>can (3) 7:1;11:2;14:12 capacity (1) 14:12 care (1) 6:2 career (1) 5:3 case (1) 7:9 certain (1) 6:7 Certainly (1) 9:6 <b>CERTIFICATE (1)</b> 16:1 changed (1) 5:2 charge (2) 5:23;14:17 charged (1) 5:22 check (1) 5:14 chief (1) 15:2 clear (1) 7:20 commander (3) 6:6,12,14 commanders (1) 8:21 <b>Commission (1)</b> 16:23 communicate (2) 8:8;9:20 <b>communications (3)</b> 13:4,17;15:1 complete (1) 16:8 concluded (1) 15:10 controlled (1) 7:14 <b>CORRECTION (1)</b> 17:1 <b>Correctional (10)</b> 4:12;8:8,22;9:21;10:10; 11:10,18;12:3;14:14;16:6 <b>corrections (2)</b> 16:10,11 Cote (1) 13:18 <b>Coulombe (3)</b> 13:5,10,22 <b>COUNTY (1)</b> 16:16 <b>course (1)</b> 5:3 <b>court (1)</b> 4:8 <b>current (1)</b> 4:18</p>	<p><b>D</b></p> <p>daily (2) 5:6,14 <b>DATE (1)</b> 17:3 <b>Dated (1)</b> 17:20 <b>day (4)</b> 5:1;7:15;16:18;17:20 <b>days (11)</b> 7:8,23;9:1,16,23;10:23; 11:6,12,20;13:2,11 <b>denoted (1)</b> 16:11 <b>deposed (1)</b> 4:3 <b>Deposition (4)</b> 15:10;16:4;17:2,3 <b>described (1)</b> 6:17 <b>Detective (1)</b> 13:17 <b>difference (1)</b> 7:15 <b>different (1)</b> 7:13 <b>directly (1)</b> 13:12 <b>document (1)</b> 11:10 <b>done (1)</b> 12:11 <b>down (2)</b> 5:18;11:14 <b>download (7)</b> 9:15;10:16,21,23;12:4,13; 14:18 <b>downloaded (9)</b> 5:22;6:1;7:23;8:23;9:23; 11:11,19;13:2,11 <b>drive (1)</b> 7:2 <b>duly (1)</b> 4:2 <b>duty (1)</b> 6:13 <b>DVR (4)</b> 6:23;7:1;10:4,7 <b>DVRs (1)</b> 7:7</p>	<p><b>enough (1)</b> 5:9 <b>entailed (2)</b> 5:6,10 <b>erased (1)</b> 7:1 <b>et (1)</b> 16:9 <b>evidence (5)</b> 6:14;13:6,19;14:16;15:4 <b>EXAMINATION (1)</b> 4:4 <b>Expires_ (1)</b> 16:23</p> <hr/> <p><b>F</b></p> <p><b>Facility (11)</b> 4:12;5:8;8:8,22;9:21; 10:10;11:10,18;12:3;14:15; 16:6 <b>Fair (1)</b> 5:9 <b>fairly (1)</b> 10:19 <b>far (1)</b> 7:7 <b>few (1)</b> 13:21 <b>finish (1)</b> 7:16 <b>floor (1)</b> 6:16 <b>following (1)</b> 8:16 <b>follows (1)</b> 4:3 <b>footage (18)</b> 5:16,20;6:7,17;7:5,22;8:2, 9,14,23;9:15,17,22;10:22; 11:10,19;13:2,10 <b>foregoing (1)</b> 16:3 <b>form (4)</b> 9:2;11:1,21;12:10 <b>FREDERICKS (10)</b> 6:21;7:16,19;9:2;11:1,13, 21;12:10;14:4;15:9 <b>full (1)</b> 7:16 <b>further (2)</b> 6:16;15:7</p> <hr/> <p><b>G</b></p> <p><b>gets (2)</b> 8:3,18 <b>given (1)</b> 16:8 <b>goes (1)</b> 5:18 <b>Goulet (1)</b> 16:9</p>
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